

Rollins, Christopher

From: karen shinmoto <karen@islandrecycling.com>
Sent: Friday, September 12, 2014 7:09 PM
To: Rollins, Christopher
Cc: Jim Nutter; Glenn
Subject: Fwd: Island Recycling Inspection (6/27/14) - Part 4
Attachments: 20140627_142057.jpg; 20140627_142352.jpg; 20140627_142540.jpg; 20140627_142606.jpg; 20140627_143105.jpg; PHOTOS FOR RESPONSE TO EPA SECTION 4 9-12-14.pdf

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From: Rollins, Christopher <Rollins.Christopher@epa.gov>
Date: Fri, Jul 11, 2014 at 9:44 AM
Subject: Island Recycling Inspection (6/27/14) - Part 4
To: karen shinmoto <karen@islandrecycling.com>, Jim Nutter <jim@islandrecycling.com>
Cc: "Samaniego, Nicole" <nicole.samaniego@doh.hawaii.gov>

Aloha Christopher:

Please see my responses to this section 4 below.

I will be responding to your last response on Monday.

Mahalo,
Karen

Karen and Jim,

Due to the size of the emails, I am sending out this fourth email with my comments and questions related to EPA's 6/27/14 hazardous waste inspection conducted at Island Recycling, Inc. in Kapolei, HI. Please review this information below and submit all responses by Friday, July 25, 2014.

If you have any questions please feel free to contact me at the number listed below or just reply to this email.

c

Christopher Rollins

U.S. Environmental Protection Agency

75 Hawthorne Street (ENF-2-2)

San Francisco, CA 94105

Phone: (415) 947-4166

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- Continued from Email Part 3 -

Used Oil Storage Areas – Continued

5) EPA observed used oil leaking and absorbent materials at the bottom of IRI's secondary containment devices [20140627_142057.JPG]. This indicates that these devices are no longer containing used oil properly. IRI needs to either cease using these devices, repair them or replace these devices to minimize releases of Used Oil on-site. It is also prohibited under RCRA for a company to fail to maintain the operations of a hazardous waste generator facility such as IRI by allowing waste to be released into the environment. Please document what IRI plans to do to eliminate these used oil releases following EPA's inspection?

As pictured with our response to Part 3, we have cleaned the secondary containers and in the process, found no leaks. We have applied absorbent to absorb the leaks at outside of the bottom of the metal closet that houses the oil containment system. Please be advised that the whole area is enclosed by a concrete berm, and we have recently coated it with a sealant.

We are also in the process of manufacturing and installing a new container closet as the older one was rusted out at the corners.

In addition, please remediate the absorbent material and have the material tested to see if the material is a hazardous waste prior to disposal. Failure to have this material tested prior to disposal could lead to an additional hazardous waste violation related to failure to make a hazardous waste determination under RCRA.

We are currently having the absorbent material from the used oil tested to determine if it is hazardous.

6) A small pan of used oil was not marked as "Used Oil" while in IRI's Used Oil Storage Area [20140627_142352.JPG]. Please mark this container and document IRI's return to compliance in accordance with the Used Oil management requirements under RCRA.

Please see attached photos.

7) EPA observed an open container of paint being allowed to dry in the air during the inspection [20140627_142540.JPG]. The paint was not marked or dated and sitting while in storage. Please close, mark and dated this container to document IRI's return to compliance under RCRA.

The paint was totally dried soon after the inspection so the container was closed and disposed of at the Private Landfill

8) EPA observed 3 x 5 gallon unmarked or dated containers [20140627_142606.JPG]. Please determine what was in these three containers and document IRI's compliance with photographs, labels and dates as appropriate.

See attached photos, as a sample of the liquid in the white unlabeled 5-gallon container was sent to ESN Pacific Labs for analysis. We have attached the results of the test, but they could not tell us what it was, so we will be having it picked up, along with the broken battery, capacitors, and broken CRT, by Pacific Commercial Services on Monday

See Attachment 1-2 that shows original labelling of the 2 grey 5-gallon containers that we determined contained Paint primer. We held the 2 buckets in the Haz mat Jobox until it we checked the MSDS sheets and they were determined to be non-hazardous.

Bailer Shear Machine

1) A small pan of used oil was not marked as "Used Oil" while in IRI's Bailer Shear Machine Area [20140627_143105.JPG]. Please mark this container and document IRI's return to compliance in accordance with the Used Oil management requirements under RCRA.

We gathered all the "drip pans" used under equipment and labelled them with USED OIL.

Please see attached photo. The exact pan may not be in this photo, but we did label all pans.

Mahalo for your patience!,

Karen

- Continued in Email Part 5 -